

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ABRAHAM PHILIP, M.D.
Plaintiff,

v.

JOHN CRONIN,
Defendant.

04cv 11069

**MOTION OF DEFENDANT JOHN CRONIN TO STAY PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Now comes the Defendant John Cronin and moves to stay the motion styled as Plaintiff's Motion for Partial Summary Judgment, filed with this Court on June 9, 2005; and further moves that the time for filing any response to Plaintiff's motion and supporting documents be extended until August 19, 2005.

In support of this motion, Defendant relies upon the Memorandum of Reasons filed herewith.

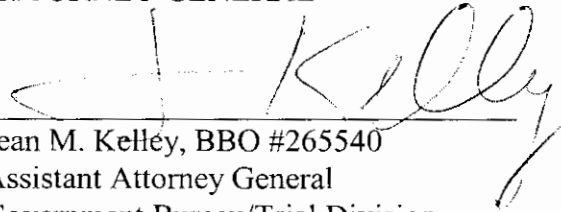
WHEREFORE Defendant respectfully requests that this Court stay the motion styled as Plaintiff's Motion for Partial Summary Judgment, filed with this Court on June 9, 2005; and further requests that this Court order that the time for filing any response to Plaintiff's motion

and supporting documents be extended until August 19, 2005.

Respectfully Submitted,
COMMONWEALTH OF MASSACHUSETTS

By its Attorneys,

THOMAS F. REILLY
ATTORNEY GENERAL

A handwritten signature in black ink, appearing to read "J. Kelley", is written over a horizontal line.

Jean M. Kelley, BBO #265540
Assistant Attorney General
Government Bureau/Trial Division
One Ashburton Place, Room 1813
Boston, MA 02108-1598
(617) 727-2200 ext. 3327
jean.kelley@ago.state.ma.us

June 14, 2005